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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of	)	
	)	
Telephone Number Portability	)	CC Docket No. 95-116

REPLY COMMENTS OF U S WEST COMMUNICATIONS, INC.

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March 17, 1998

TABLE OF CONTENTS

Page

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	)	
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I. INTRODUCTION AND SUMMARY

Below, U S WEST Communications, Inc. ("USWC") responds to those parties that opposed our Petition for Extension of Time[1] in the instant proceeding. We address those particular criticisms lodged by various parties with respect to that Petition, particularly with respect to our proposed timeline. We demonstrate that (1) a production-ready Number Portability Administration Center Service Management System ("NPAC/SMS") will undoubtedly not be ready before May 11th, despite MCI's assertions to the contrary; (2) the 25 transactions per second requirement for Long Term Number Portability ("LNP") is not something that is holding up or extending the deployment of LNP; (3) that USWC's revised testing and implementation schedule is not unduly lengthy due to any lack of proper

[1] Petition for Extension of Time of U S WEST Communications, Inc., CC Docket No. 95-116, filed Mar. 2, 1998 ("Petition"). Public Notice, Common Carrier Bureau Seeks Comment on Petitions for Extension of Time of the Local Number Portability Phase I Implementation Deadline, DA 98-451, rel. Mar. 5, 1998. Petitions include AT&T Corp. ("AT&T"), GTE Service Corporation ("GTE"), MediaOne, Inc. Pacific Bell and USWC. Comments and oppositions, filed Mar. 12, 1998, by AT&T, BellSouth Corporation ("BellSouth"), MCI Telecommunications Corporation ("MCI"), SBC Companies ("SBC") and WorldCom, Inc. ("WorldCom").

Human Resources (or "HR") planning or personnel; (4) the timeframes incorporated into USWC's proposal are reasonable, particularly the 67 days associated with Phase I deployment; and (5) that at least one carrier bemoaning the inadequacy of Interim Long Term Number Portability ("ILNP") overstates its case since that same carrier has not placed orders for ILNP in our territory.

Essentially, those parties opposing USWC's Petition do so primarily with respect to USWC's proposed timeline. Those commentors engage in second-guessing what is an appropriate timeline for USWC. Below, we demonstrate why the timeline we propose is more than reasonable. We ask that the Federal Communications Commission ("Commission") grant us the times requested.

As has repeatedly been stated, LNP is probably the most complicated network/database network technology deployment ever undertaken. Given the fact that the instant Petitions have their genesis in vendor conduct outside of the control of those carriers deploying LNP, an adjustment to the Commission's prescribed deployment schedule is warranted.

That the deployment timelines associated with the various Phases might extend 60-90 days beyond that prescribed is not patently unreasonable. Indeed, USWC has met its burden in demonstrating the reasonableness of our request. While we cannot guarantee that we will successfully complete that deployment schedule -- because any venture of this nature involves some assumptions and,

therefore, unknowns and risk[2] -- we can guarantee that now is not the time for second-guessing.

II. RESPONSE TO VARIOUS COMMENTORS

A. MCI Is Incorrect That A Production-Ready NPAC/SMS Can Reasonably Be Expected To Be Delivered Before May 11th And, Thus, A Shorter Timeline Achieved

MCI repeatedly takes issue with the May 11th date as the "production-ready" NPAC/SMS date,[3] despite the fact that other commentors, such as AT&T, assert that the date is a "consensus" date reached by the affected parties.[4] MCI takes issue as much with Lockheed Martin as it does with any of the petitioning incumbent local exchange carriers ("ILEC"). Those carriers have based their timelines on the expectation that a production-ready NPAC/SMS will be available from Lockheed Martin on May 11th. MCI fails to demonstrate that such is incorrect.

MCI seeks to establish that certain of the action items associated with the Lockheed Martin Project Plan which will lead to a production-ready NPAC/SMS can

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[2] For example, as USWC pointed out in our Petition, a work stoppage could impact the ability to successfully deploy LNP in Phase III, which could affect subsequent Phases. Petition at Attachment 1, Affidavit of Timothy E. Mason at 5, n.4 ("Mason Affidavit").

[3] MCI Opposition at 5 (claiming that the date "was simply an estimate of the maximum amount of time it should take for each service provider to become certified" and was a "conservative estimate" at that), 6, 9. WorldCom, while not disputing the date *per se* suggests that a production-ready NPAC/SMS might be available earlier than May 11th. WorldCom Comments at 7-8.

[4] See AT&T Comments at 5. Compare AT&T Petition at 5. See also SBC Comments at 2.

be compressed.[5] USWC is not about to argue with Lockheed Martin, who -- we believe -- has far more expertise in this particular area than does MCI. As Lockheed Martin is the recently-contracted vendor for the Western Region Limited Viability Company ("Western Region LLC" or "LLC"), USWC is relying on its expertise and Project Plan as being necessary prerequisites for the final delivery and availability of a production-ready NPAC/SMS.

While it may be the case that a day or two less is required for each of the action items identified by MCI, USWC cannot assure that such is the case. Based on the expertise and experience of Lockheed Martin, USWC is not willing to base a timeline on dates other than those identified by the current Western Region LLC vendor.

B. MCI's Discussion Of The 25 Transactions Per Second Performance Standard Is Beside The Point And Not Relevant To The Granting Or Denying Of USWC's Petition

In typical "shotgun" fashion, MCI attacks the fact that USWC identified, in our Petition and associated Mason Affidavit, that a contractual requirement included in the Western Region LLC contract with Lockheed Martin called for a production-ready NPAC/SMS that performed at a level of 25 transactions per second.[6] MCI asserts that "[USWC] cannot substantiate this alleged need."[7]

[5] MCI seeks to shorten the timeframes associated with the Lockheed Martin LNP NPAC/SMS Project Plan. MCI Opposition at 8 (identifying various aspects of the Lockheed Martin Project Plan that MCI believes can be shortened).

[6] Id. at 10.

[7] Id.

There appears to be some confusion around the 25 transaction per second requirement. As such, USWC clarifies the requirement. We demonstrate that -- despite MCI's protestations -- the requirement represents no material hurdle with respect to the May 11th date for a production-ready NPAC/SMS or USWC's proposed LNP deployment schedule.

As MCI notes, the precise requirements associated with the 25 per transactions requirement is currently being addressed in industry fora.[8] It is not clear that Lockheed Martin can, in fact, deliver at this rate. However, the Western Region LLC contract with Lockheed does not require that such occur at the time the NPAC/SMS is turned up. Rather, that contract requires only that "[w]ithin 60 days of the contract signing date, a plan to achieve 25 transactions per second must be completed."[9] USWC is not holding Lockheed Martin to a 25 transactions per second requirement before it will certify a production-ready NPAC/SMS on May 11th[10] or proceed with our LNP deployment schedule. Thus, MCI's arguments in this respect are irrelevant.

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[8] Id.

[9] Mason Affidavit at 3 ¶ 8.

[10] The 25 transactions per second requirement was actually one adopted by the North American Numbering Council ("NANC") with respect to the NPAC/SMS vendors. It was "adopted" by the Commission, when the Commission endorsed the NANC requirements. See In the Matter of Telephone Number Portability, Second Report and Order, 12 FCC Rcd. 12281, 12318 ¶ 62. This endorsement is an Attachment to the contract. Thus, parties contracting with Lockheed Martin, who has yet to achieve a 25 transaction per second capability, are attempting to resolve a proverbial "rock and a hard place" situation. USWC has every confidence that a resolution will be achieved.

C. USWC Has Not Inappropriately Dedicated Human Resources To LNP

A number of parties attack USWC for its discussion in the Mason Affidavit that LNP interoperability testing requires employees with specialized skill sets, precluding simultaneous interoperability testing in USWC's Western, Eastern and Central regions simultaneously.[11] The commentors' discussions allow them the opportunity to wax less than eloquently from a rhetorical perspective and, failing to adequately reflect the relevant facts and context, render their arguments nothing more than shrill hyperbole.

The fact is that USWC has more than adequately addressed its HR needs with regard to LNP. The Commission's original schedule allowed USWC 105 days for Phase I; 45 days for Phase II and 46 days for Phase III.[12] Within those time-frames, USWC had no problem in assigning those employees who have the "specialized skill sets" referred to in the Mason Affidavit to the necessary tasks associated with Interoperability Testing.

It should be noted that no company other than USWC addresses the time-frame associated with Interoperability Testing. That testing actually occurs before a production-ready NPAC/SMS goes on line. In the Mason Affidavit associated with USWC's Petition, USWC states that we intend to engage in Interoperability Testing

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[11] See, e.g., AT&T Comments at 7; MCI Opposition at 10-11 (apparently unfamiliar with the definition of "obscene," MCI asserts in its typical overstated fashion that USWC's facts and arguments in this respect are properly characterized as "obscene"); WorldCom Comments at 8-9.

[12] See Mason Affidavit at 7. Compare BellSouth's reading of the Commission's rule as having allowed 180 days for Phase I, 135 days for Phase II and over 90 days each

for the Eastern Region (the Phase I deployment in Minneapolis) from March 12, 1998 through May 15, 1998;[13] with such testing following in the Western Region (Phase II, Seattle) and the Central Region (Phase II, Phoenix) on April 13, 1998 through June 8th, 1998.

As explained in the Mason Affidavit, Interoperability Testing involves "closed system" tests, which are a necessary predicate to certifying the NPAC/SMS prior to

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to implement the remaining Phases (BellSouth Comments at 8) and SBC's reading of the requirements as allowing 90 days for each Phase (SBC Comments at 3).

[13] Some commentors attack the fact that USWC proposes not to begin Phase I carrier-to-carrier testing until May 18th, which is a Monday. See AT&T Comments at 6. That "begin date" would be one weekend after the end of Interoperability Testing in the Eastern region and one week after the delivery of a production-ready NPAC/SMS by Lockheed Martin. During the five working days between May 11th and May 18th, USWC intended to do the kind of database clean up necessary to move from a test to a live environment.

Based on the filings of other parties, where the subject of Interoperability Testing is not generally addressed or discussed but where start and end dates are provided for the various Phases, it appears to USWC that others may be incorporating this clean up period within Phase I as opposed to identifying it as occurring prior to Phase I. See Mason Reply Affidavit attached hereto at 1 ¶¶ 3-4. For example, USWC could have stated that it intended to begin Phase I on May 12th, completing on July 17th. The "clean up" work referenced by USWC as occurring during the Interoperability Testing portion of the deployment schedule would then have been incorporated into Phase I. Under such a schedule, Phase I would have commenced on May 12th, with the Interoperability Testing in the Eastern Region (Minneapolis MSA, Phase I) extending through that Friday (May 15th), with carrier-to-carrier testing beginning the following Monday, May 18th (the same date that USWC currently identifies). Had the USWC proposed timeline been so crafted, it would have extended the number of dates associated with Phase I from 67 days to 74 days.

The fact that any particular carrier's presentation of its proposed timeline and schedule could be affected by such internal decisions around where a particular project is appropriately lodged from a logic perspective points out that, for purposes of the requested extension, it is the completion date rather than the start dates that are critical. The Commission should focus on those dates.

carrier-to-carrier testing.[14] The fact that such testing must occur within discrete Operations Support Systems ("OSS") for the first three Metropolitan Statistical Areas ("MSA")[15] turned-up by USWC means that the skills required involve not only a keen knowledge of the OSS involved (something that quite a number of USWC employees possess)[16] but a knowledge of LNP capabilities and service ordering associated with LNP. It is the "latter" skill sets that are localized in USWC and in short supply.

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[14] Mason Affidavit at 4 ¶¶ 10-11.

[15] WorldCom is incorrect in its assertion that USWC seeks to test each system "again and again for every new MSA in every phase." WorldCom at 9. Similarly, AT&T's argument that "[a]fter intercompany testing of the Lockheed NPAC/SMS is completed for Phase I MSAs in each region, there is no valid reason for that testing to be repeated in subsequent MSAs" (AT&T at 11) is in error.

As USWC pointed out in our original Petition and Mason Affidavit, each of the first three MSAs in which USWC will deploy LNP will involve testing with a different OSS (Minneapolis involving Eastern (Phase I), Phoenix involving Central (Phase II) and Seattle involving Western (Phase II)).

[16] AT&T claims that USWC's position is "inherently contradictory" because one would assume that if there are three discrete OSS there must be experts in each region on each system. AT&T at 7. See also MCI at 10-11 (expressing confusion over the fact that the discrete OSS obviously have different support personnel and wondering why the same personnel are not appropriately utilized with respect to the OSS and LNP deployment). Both AT&T and MCI are correct that there are dedicated employees with respect to knowledge and operation of the three OSS systems generally.

However, as the Mason Reply Affidavit makes clear, the problem USWC faces is not employees who lack general knowledge of the OSS or their capabilities but the intersection of the OSS expertise with LNP requirements. Mason Reply Affidavit at 2 ¶¶ 7-8. Contrary to AT&T's suggestion, the "solution" to this matter is not simply to combine an OSS expert with an LNP expert. AT&T at 7. The skills required are part of a combined "set" lodged in specific individuals and are not capable of being parsed among discrete employees who each possess a single skill.

It would hardly have been a prudent use of resources or monies for USWC to train every single USWC employee familiar with OSS on LNP and its attendant requirements. Rather, focusing expertise in a core group of employees assures that neither service providers nor end users pay for duplicate expertise where such duplication is not necessary.

Yet, despite the limited number of employees that have the appropriate skill sets, USWC could have -- and would have -- met the Commission's prescription regarding LNP deployment but for the Perot breaches and the delay attendant to changing NPAC/SMS suppliers.[17] At this time, there is insufficient time and resources available to "overlap" Interoperability Testing across USWC's three regions simultaneously. In any event, given USWC's proposed timeline, no party is harmed since the later Interoperability Testing (that involving the Phase II MSAs) concludes before the carrier-to-carrier testing for Phase II begins.[18]

Thus, despite the shrill commentary of those commentors opposing USWC's timeline, it is obvious that USWC has properly staffed for LNP and, barring the vendor breaches and the attempts to compress the originally-granted Commission timeframes associated with the various Phases to overcome the effects of those breaches, USWC would not even be in the position of having to defend its HR

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[17] Thus, WorldCom's assertions that USWC's personnel decisions "appear to be [established] for strategic advantage" and represent a situation where USWC "has failed to staff properly" (WorldCom Comments at 8) are incorrect. Similarly missing the mark are MCI's assertions that USWC has "not managed its human resources in an efficient and responsible manner" and has "poorly planned its resources." MCI Opposition at 10, 12.

practices.[19] Because those practices were reasonable and prudent given the circumstances facing USWC, they should not be deemed imprudent or unreasonable at this time.

D. USWC's Proposed LNP Deployment Timeframes Are Reasonable

A number of commentors argue that USWC's timeline, particularly that associated with Phase I, is too long.[20] As a result of what those commentors argue is a too-long timeframe for Phase I, the timelines associated with the other Phases are also argued to be unreasonable.

AT&T argues that each Phase should be no longer that 14 days, until carriers are caught up with the Commission's mandated timeline for LNP deployment.[21] AT&T argues that, since everything associated with LNP should already be completed -- save the incorporation of a production ready NPAC/SMS -- the timeframes proposed by USWC are too long. After all, argues AT&T, "the only aspects of LNP that [will not be in place by the new NPAC/SMS 'live' date] are

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[18] Below, we demonstrate why Phase II will probably not begin before July 18, 1998 as stated in the Mason Affidavit at 5 ¶ 13(b).

[19] AT&T's assertion that comparisons in the Petitions between expected deployment timeframes and the timeframes originally incorporated in the Commission's prescribed schedule are "inapposite" for purposes of determining whether a carrier's currently proposed deployment schedule are reasonable (AT&T Comments at Summary, 8-9) is clearly incorrect. Carriers currently requesting extensions were required to do so based on the current operating state of affairs. Those affairs were at a *status quo* based on prior vendor contracts and assumptions, including assumptions associated with the Commission's days-per-Phase. Such assumptions cannot unilaterally and categorically be changed overnight.

[20] Under the USWC proposal, Phase I would incorporate 67 days, some of which are weekend days. The significance of this fact is discussed further below.

[21] AT&T Comments at Summary i-ii, 8-9. Compare AT&T Waiver at 6.

those that directly relate to carriers' ability to place 'orders' for porting with the NPAC/SMS, and to download routing information."[22]

USWC disagrees with AT&T's "normalized" analysis. Contrary to the AT&T approach, we believe that the amount of time associated with carrier-to-carrier testing necessarily is dependent on the number of carriers that are participating in the testing in any particular MSA, their experience with LNP testing and whether they have been previously certified with the host ILEC. Furthermore, while AT&T correctly identifies the most material actions associated with going "live" once the NPAC/SMS is certified, it ignores the fact that the placing of orders and routing of calls presents a far greater challenge to the ILEC than any other carrier because the ILEC is the carrier which will have the greatest activity associated with the placement of orders and the routing of calls.[23] As BellSouth has correctly observed, "an RBOC ILEC, is not only expected to handle thousands upon thousands of such

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[22] Id. AT&T asserts that this should not be a big challenge since the "interfaces" associated with the NPAC/SMS should be the same whether a carrier is working with a Perot or Lockheed Martin NPAC/SMS. AT&T Comments at ii, 9-10. AT&T incorrectly assumes some relevancy between the interfaces and the timeframes. In fact, as between Perot and Lockheed Martin, it is the interface *protocols* that are the same; the NPAC/SMS themselves are quite different. As the attached Mason Reply Affidavit demonstrates, there is no issue with the "interfaces;" nor do such interfaces represent the need for the timeframes associated with the various Phases. Mason Reply Affidavit at 2-3 ¶ 9.

[23] See BellSouth Comments at 5-6 and n. 11 (noting that the Commission has itself observed that the vast majority of telephone numbers will initially be ported away from Regional Bell Operating Companies ("RBOC"), not from competitive LECs ("CLEC")). And see SBC at 2-3.

requests from multiple CLECs, but is expected to integrate such requests in a seamless order provisioning process."[24]

In the Mason Affidavit attached to USWC's Petition, we pointed out that we had eight co-providers with whom we must test in Phase I, Minneapolis. While some of those providers might utilize a Lockheed Martin LNP NPAC/SMS outside of the Western Region, USWC has never utilized this NPAC/SMS.

Based on these facts, the Western Region Inter-Company Test Plan (which was developed through a consensus of the carriers in the Western Region)[25] requires a testing pattern of five days per carrier, based on 8 hour/5 day a week testing shifts. Using these established and agreed-upon testing durations, USWC would require 40 working days to complete inter-company testing in the Minneapolis MSA.

It is possible that this Inter-Company testing period could be shortened or further compressed if the testing shifts were longer than 8 hours a day (e.g., 16 or 24 hours a day, representing two or three shifts) or more than 5 days a week (e.g., including weekend testing). Obviously, such extended testing would not be without additional LNP deployment costs -- costs which USWC would expect to recover.

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[24] BellSouth at 6.

[25] As noted in the Mason Reply Affidavit, both AT&T and MCI participated in the development of this Plan. Mason Reply Affidavit at 3 ¶ 12. It should also be noted that, while AT&T and MCI both agreed on the Plan "model," both have decided to participate in inter-company testing only in the Minneapolis MSA.

However, It has been USWC's experience that other carriers are not interested in, or willing to pursue, double and triple shift or weekend testing.[26] Smaller carriers, in particular (which represent four of the eight carriers who will be testing in the Minneapolis MSA) are unable to staff to meet such a schedule.

In reflecting on the filed comments, it dawned on USWC that there is a different deployment model that USWC could institute regarding carrier-to-carrier testing that might allow for some carriers to begin offering LNP earlier than July 18th (USWC's proposed completion of Phase I). Whether the model is appropriate with respect to a "level playing field" is a different question and one the Commission should consider.

Since USWC will be "done" with its work regarding LNP deployment on May 15th (a Friday) and will begin carrier-to-carrier testing on May 18th (a Monday), USWC could turn LNP up in a "live environment" on that date. It is possible to structure a carrier-to-carrier testing model that gives carriers a "testing time," determined by lottery, that would allow Carrier X, who tests in week 1, to begin porting numbers by the end of that week. Under this model, carriers would be engaged in staggered testing and live turn ups. For example, in the Minneapolis

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[26] See Mason Reply Affidavit at 3 ¶ 13, where Mr. Mason notes that, in a recent testing situation involving testing on the Perot NPAC/SMS, USWC was staffed to perform tests on a 16 hour per day/6 day a week schedule and MCI was unable to provide staffing to test with USWC outside the standard 8 to 5, 40 hour week schedule. As a result, USWC was required to modify its schedule to accommodate MCI's inability to pursue an extended testing schedule. Thus, it is curious that MCI claims that it is "eager to complete LNP testing" and urges the Commission to require ILECs to establish deployment plans that involve "increas[ed] staff and working extended hours." MCI Opposition at 6.

MSA (Phase I), the difference between the first CLEC entry date and the last would span a period of 55 days. While some carriers would go up earlier than others, the lottery process would eliminate any intentional discrimination as to who those carriers are.

While the model described above is "nondiscriminatory," we imagine that most carriers will not find it attractive, preferring rather a full and fair opportunity for testing and training combined with a "single" completion date for Phase I and a "LNP live" status equal among all carriers in an MSA. USWC's proposal does, however, "cut down" the length of time associated with each Phase with respect to those carriers that secure lottery numbers allowing for early turn-up.

Finally, while it is true that Lockheed Martin is the NPAC/SMS vendor for a number of Regional LLCs and carriers in other parts of the country, it is not correct to assume that the experience and knowledge associated with others' implementation of Phases I and II will necessarily transfer from those implementations to carriers in the Western Region.[27] As BellSouth has correctly observed, such "'knowledge transfers' or 'informal contacts'" can only go so far.[28]

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[27] Compare AT&T Petition at 6 and n.10 (arguing that the experience and knowledge gained from such prior deployments provides support for further compressing the timeframes proposed by the various Petitioners with respect to deployments in their respective regions), MCI Opposition at 7 (experiences with Perot should allow for a shorter deployment with Lockheed Martin; Lockheed Martin's position as a supplier to other ILECs should allow for a more compressed deployment schedule than that proposed by the various Petitioners).

[28] BellSouth Comments at 6-7.

They can almost certainly not take the place of real-time interactions between carriers' operations and the delivered Lockheed Martin NPAC/SMS.[29]

E. At Least One Carrier Attacking ILNP Does Not Purchase The Service In USWC's Territory

AT&T incorporates into its advocacy what has become routine, standard "potential for anticompetitive conduct" rhetoric.[30] It argues that LECs generally (i.e., no LEC in particular) have an incentive to delay the deployment of LNP while CLECs critically need this capability to enter the market. In further support of the "harm" CLECs suffer from LNP delays, AT&T cites to payments that CLECs must make for the inferior ILNP, with the clear suggestion that AT&T is currently incurring such charges.[31]

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[29] For example, such knowledge and contacts could not alleviate the necessity for a waiver request from a company that actually worked with Lockheed Martin all along yet found itself unable to completely implement LNP according to the Commission's prescribed schedule. See Petition for Waiver of 60 Day Requirement of 47 CFR§52.3(d) of Southwestern Bell Telephone Company and Pacific Bell, CC Docket No. 95-116, filed Feb. 20, 1998 and publicly noticed on March 3, 1998. Public Notice, Common Carrier Bureau Seeks Comment on SBC Companies Petition for Waiver Under 47 CFR § 52.3(d) and Petition for Extension of Time of the Local Number Portability Phase I Implementation Deadline, DA 98-407, rel. Mar. 3, 1998. The complexity of delivering LNP extends beyond the NPAC/SMS and involves the interaction of numerous systems, features and functions, all of which are complex and which only increase in complexity as they attempt to interact with each other.

[30] See, e.g., AT&T Comments at 3 (arguing that a delay in LNP deployment is "costless, if not beneficial" to ILECs and that such carriers "can gain significant advantages by delaying [its] implementation"), 4 ("ILECs potentially benefit by delaying [LNP]" (underline in original)).

[31] See id. at 4 (until LNP is deployed carriers "will, in effect, be required to pay for both interim and permanent portability for each customer that ports a number"), 4-5 ("ILECs will obtain additional payments from CLECs for ILNP services provided to existing CLEC customers after the date on which [LNP] should have been available").

For the record, AT&T does not currently subscribe to ILNP in USWC's territory. Thus, at least in our territory AT&T is paying nothing for LNP and certainly is not incurring "both" or "additional" ILNP and LNP charges. Although all carriers in the Western Region -- including USWC and AT&T -- have been incurring costs for the NPAC/SMS, the out-of-pocket financial harm AT&T asserts it might incur daily as a result of the LNP delay in the Western Region is obviously overstated.

III. CONCLUSION

For all of the above reasons, the Commission should reject the oppositions to the timeframes proposed by USWC in its Petition and should grant USWC the relief we requested in that Petition.

Respectfully submitted,

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March 17, 1998

STATE OF COLORADO)
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REPLY AFFIDAVIT OF TIMOTHY E. MASON

I, Timothy E. Mason, first being duly sworn, hereby state that the following information is true and correct to the best of my knowledge, information and belief.

1. I submit this Affidavit in support of the Reply Comments of U S WEST Communications, Inc., ("USWC") filed on March 17, 1998, responding to those commentors who oppose USWC's previously filed Petition for Extension of Time (filed March 2, 1998) ("Petition") seeking relief from the Federal Communications Commission ("FCC" or "Commission") current Long Term Number Portability ("LNP") deployment mandates.

2. In this Affidavit, I confine myself to three issues. (1) I respond to those attacking the reasonableness of USWC's timeline in general and the time identified as involving Interoperability Testing specifically; (2) I respond to those who attack USWC's human resources policies, particularly as those policies involve the dedication of employees to that aspect of LNP which intersects with USWC's Operations Support Systems ("OSS"); and (3) I respond to the mistaken notion advanced by AT&T that USWC's proposed LNP deployment schedule is somewhat inappropriately extended because of an issue involving "interfaces."

3. In my opinion, the critical dates referenced in USWC's Petition and my attached Affidavit have to do with the completion dates associated with any particular Phase. Thus, for example, the critical date associated with Phase I is July 18, 1998; with Phase II, it is August 14, 1998. What precedes the completion dates is of necessity somewhat fluid in nature, and might appropriately be categorized either as pre-Phase activity or might be incorporated within the Phase timeframe itself.

4. For example, it appears that – in outlining our proposed timeline -- USWC included certain functions, i.e., returning the NPAC/SMS to a live network ready status versus a test status (Mason Affidavit ¶ 13), within the Interoperability Testing portion of our Project Plan whereas other carriers may have included this activity instead in their carrier-to-carrier testing activity. Because USWC identified this time pre-Phase (i.e., occurring from May 12th through May 15th, (a Friday)), we identified Phase I as beginning on May 18th (a Monday). From this description, it appears that USWC intends to begin carrier-to-carrier testing one week later than Pacific's proposed start date, for example. Because the activities USWC included in our discussion of Interoperability Testing must occur prior to actual carrier-to-carrier testing, we assume that other carriers are performing them as well, yet incorporating them and addressing them in a somewhat different narrative and descriptive model than USWC.

5. For that reason, it is my opinion that the beginning date of any particular Phase should not be equated with the end date in terms of its criticality. Focusing on the latter date, for example, USWC's Petition shows a completion date of July 17, 1998, while Pacific shows a completion date of July 20, 1998. Obviously, the approximate duration of the time necessary to complete Phase I is similar whether certain activities are incorporated in the Phase or backed out from the Phase and separately identified.

6. With respect to arguments raised by commenting parties regarding USWC's inability to concurrently engage in Interoperability Testing across our three regions (Eastern, Central and Western) simultaneously in such a way that such testing would operate concurrently with respect to Phases I and II (Minneapolis MSA, Eastern, Phase I; Phoenix MSA, Central, Phase II; Seattle MSA, Western, Phase II), I reiterate what I said in my original Affidavit (at ¶ 13). USWC lacks the "skill sets" necessary to utilize those employees with the necessary skill sets simultaneously across our entire region and with respect to each OSS.

7. USWC agrees with AT&T and MCI that we have technical resources across the three regions that have expertise in the OSSs within those regions. However, that is not the issue. The restraint in expertise lies not with respect to the discrete OSSs but in the combination of technical expertise and experience in multiple technical areas: 1) Regionally specific OSSs, 2) Regionally specific Service Order processes and order writing, and 3) LNP. I can personally attest to the difficulty associated with finding personnel that are experts in a single subject matter area. When it is necessary to have personnel that are experts in a number of subject matter areas, it becomes correspondingly and significantly more difficult. The resources we are talking about are not personnel that one can hire off the street. Their particular expertise, particularly as it is combined with expertise across different areas and systems, takes time, often years, to develop. Additional resources of this type would be very difficult to identify, and almost impossible to secure, between now and the end of 1998 – when USWC proposes to finally complete Phase V of LNP.

8. Despite limited resources in USWC that incorporate the necessary skill set, USWC was adequately staffed to meet the original mandated dates for the implementation of LNP. The Phases were sufficiently and adequately staggered to allow USWC to perform Interoperability Testing in the three regional areas separately. With the recent change in NPAC/SMS service provider from Perot to Lockheed (which USWC could not have foreseen) and USWC's proposed compression of the Commission's mandated deployment dates within each Phase, the limited nature of those resources becomes more problematic. Yet I continue to believe our proposed deployment schedule with staggered Interoperability Testing is a reasonable and prudent approach.

9. AT&T asserts that, despite the change in NPAC/SMS vendor, that deployment of LNP should not be significantly or materially impacted because the "interfaces"

associated with that deployment are the same whether the vendor is Perot or Lockheed Martin. See AT&T Comments at page 9. I am unclear what point AT&T is trying to make, since USWC has never used the "interfaces" between the Lockheed Martin NPAC/SMS and USWC's OSSs as the basis for USWC's proposed extension. In my opinion, the interface referenced by AT&T is irrelevant to the current need for an extension, since the problem lies not in the interface between the Lockheed Martin NPAC/SMS but with the different NPAC software that now must be tested, and the significantly different downstream systems within these three regions that operate after the interfaces have done their work.

10. Due to Perot's inability to deliver a production ready NPAC/SMS, USWC was unable to fully test all three regions and their associated downstream OSSs. It is only prudent, due to the complexities of LNP and the impacts to all of our OSSs, that USWC perform adequate Interoperability Testing in all three regions.

11. In AT&T's comments regarding the duration of time necessary to perform Intercompany testing, it states that 30 days should be adequate to perform these tests. USWC believes that the duration is totally dependent upon the number of CLEC's that are participating in that MSA, their experience with LNP, and if they have been certified with the ILEC previously.

12. For example, in the Minneapolis MSA USWC currently has 8 CLECs that require certification. The current Western Region Intercompany Test plan that has been agreed upon by the CLEC's participating requires 5 days per CLEC to complete, based upon an 8 hour/5 day week schedule. It should be noted that AT&T and MCI participated in the development of the Western Region Intercompany test plan and agreed to the tests and duration within that plan. Using these established and agreed upon testing durations, USWC would require 40 working days to complete Intercompany testing in the Minneapolis MSA.

13. Given what I said above, it is clear that the 60 days incorporates some assumptions: 1) 40 hours per CLEC to complete all tests, and 2) availability of the CLEC to test with USWC. It is, of course, possible that the timeframe could be significantly shortened if the testing schedule were to shift from 8 hours per day/5 days per week to 24 hours per day/7 days per week. However, it has been my experience in the LNP testing context that most carriers are unable to staff to meet such a schedule. For example, I am aware of a recent situation associated with carrier-to-carrier testing regarding Perot's NPAC/SMS. USWC was staffed to perform tests on a 16 hour per day /6 day per week basis and MCI was unwilling to provide staffing to test with us outside the traditional 8 to 5, 40 hour work week. As a result, USWC had to modify its schedule to accommodate MCI's inability to provide adequate staffing.

14. I fully understand the need to manage budgets and minimize cost as a general matter and also within the specific context of LNP deployment. Extending test hours into evenings, nights and weekends carries a premium dollar cost. Just as important, with

the limited number of skilled personnel available for these tests, increasing the number of hours and days of testing could introduce a fatigue factor with personnel that could cause errors to be made. Based on both of these considerations, it is my belief that the Intercompany test plan that was developed is reasonable.

15. As I have referenced in previous paragraphs of this Reply Affidavit there are a number of factors that led to the development of USWC's dates for the implementation of LNP. Some of those factors include: 1) Staggered Interoperability Testing due to unique regional OSSs; 2) number of CLEC's within an MSA requiring certification; and 3) the duration of time required to perform those certification tests. It is clear to me that USWC is technically capable of providing commercial LNP in Phase I upon completion of the certification testing of Lockheed's NPAC/SMS, which is currently scheduled to complete May 11, 1998. The most significant delay to the CLECs' immediate ability to port numbers in an LNP environment is the Intercompany Testing period.

16. In the current plans of all the ILEC's is a period of time from 30 to 60 days where the CLECs perform their Intercompany Testing with each other and the ILEC. Some will complete this activity within the first week of the testing period while others will not be scheduled to begin testing for 55 days, but all have to wait until the entire group has completed its Intercompany Testing prior to their ability to process orders for LNP within that MSA.

17. An alternative to this process could be a lottery system, where each CLEC within that MSA would draw a testing date and, upon successful completion of Intercompany Testing, the CLEC could immediately begin to submit LNP orders. In this process, some CLECs would certainly be able to enter into the competitive arena sooner than others, but USWC would not impede their entry. The equity would be different from the current plan, but based upon the lottery each CLEC would have an equal chance of entering into the market ahead of their peers. Obviously this means that some would be significantly delayed from entering the market until their scheduled testing date came up and they successfully completed their Intercompany Testing. In the case of the Minneapolis MSA the difference between the first CLEC entry date and the last would be 55 days.

Timothy E. Mason

Subscribed and sworn to before me this 17th day of March, 1998.
Witness my hand and official seal.

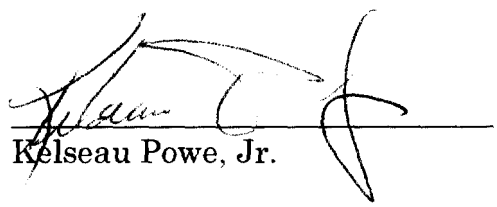
My commission expires 6-24-2002

Notary Public

DANIEL A. FLOREZ
NOTARY PUBLIC
STATE OF COLORADO

CERTIFICATE OF SERVICE

I, Kelseau Powe, Jr., do hereby certify that on this 17th day of March, 1998, I have caused a copy of the foregoing **REPLY COMMENTS OF U S WEST COMMUNICATIONS, INC.** to be served, via United States Mail,* postage pre-paid, upon the persons listed on the attached service list.**



Kelseau Powe, Jr.

*Served via hand delivery.

**A electronic version of the Reply Comments (on a 3x5 inch diskette, with a cover letter) is also being filed with Magalie Roman Salas, the Secretary of the FCC, as required by the March 5, 1998 Public Notice (DA 98-451).

(cc95-116L-cos)

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